

1 measure commercial to measure non-commercial.

2 THE WITNESS: Correct. Do you want me to
3 expand?

4 JUDGE SIPPEL: Your witness. Do you want
5 him to go ahead?

6 MR. PRICE: Sure, go ahead. Yes.

7 THE WITNESS: To the degree of the
8 economic viability is important to us and we have to
9 go out and seek the support of listeners, seek the
10 support of corporations and foundations who more
11 generally understand the concepts used by commercial
12 radio stations. We need to be in a position to
13 provide them with comparative audiences.

14 BY MR. PRICE:

15 Q In making your programming decisions, you
16 indicated yesterday you had as general manager
17 maintained final decision-making. You as general
18 manager had final say in what programming changes were
19 made, correct?

20 A Correct.

21 Q Did you involve others in this decision
22 making process?

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1 A Yes. Yes I would.

2 Q Can you tell me a little bit about how
3 that would have worked?

4 A For instance I would have consulted with
5 Bill Helgeson on any program changes that were made at
6 the station. For instance if I wanted to create a new
7 program or modify an existing program, I would have
8 worked with the producer and host of that program.

9 The two examples being what eventually
10 became known as Work with Marty Nemko. That was a
11 program that existed under a different format and a
12 different shape and a different sound. So I would
13 have worked with Marty, no pun intended, to turn that
14 program into what it eventually became.

15 For the program Open Air, a program that
16 previously existed at the station as an hour long
17 weekly program, I would have worked with Michael
18 Johnson and Alan Farley to reshape that program into
19 what it eventually became, a daily arts and culture
20 program.

21 Q Now was it your impression that others
22 were always happy or agreed with these decisions?

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1 A No, I could not make everyone happy.

2 Q But ultimately as you said just a moment
3 ago, the economic viability of the station required
4 that you be responsible to the community, correct?

5 A Correct.

6 Q Did that ultimately guide your decision-
7 making?

8 A Yes. Our capacity to provide a public
9 service was measured with respect to the number of
10 listeners who we are actually serving. Our best
11 estimate on how many listeners that we actually served
12 we gauged through the research that I used at the
13 station.

14 Q Did you ever memorialize or put to writing
15 your experience at KALW?

16 A Yes. If I understand your question with
17 respect to letting my immediate supervisor know of the
18 accomplishments that the station achieved during my
19 tenure, I provided Mr. Palacios a memo as I left the
20 station.

21 Q Now if you could turn to SFUSD Exhibit No.
22 18, tell me if that's the document you're referring

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1 to, that being your memo to Mr. Palacios, in January
2 of 1998 summarizing your tenure at the station?

3 A Yes, it is.

4 Q Can you briefly summarize for the court,
5 in your own words, the most significant contributions
6 you made to KALW from the time you arrived in August
7 of '96 and when you left in January of '98?

8 A Sure. The things I'm most proud of were
9 that by the time I left the station it was in much
10 better condition and shape than I found it. Which
11 isn't to say that the station wasn't performing at a
12 great level when I got there.

13 The station had around 100,000 listeners
14 when I arrived at the station. By the time I left we
15 were serving over 100,000 listeners. The things I'm
16 most proud of at the station were that --

17 JUDGE SIPPEL: I'm sorry, but before you
18 took over there were 100,000?

19 THE WITNESS: There were under 100,000.

20 JUDGE SIPPEL: Under a 100,000. And then
21 there were over 100,000.

22 THE WITNESS: Over 100,000.

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1 JUDGE SIPPEL: Thank you, okay. Go ahead.

2 THE WITNESS: The things I was absolutely
3 most proud of during my tenure at the station, we were
4 able to move the station to a new a permanent home
5 after nearly eight years in a high school gymnasium
6 following the 1989 Loma Prieta earthquake.

7 I'm proud that I increased listenership.
8 When you increase listenership, that's the most direct
9 signal that you're strengthening the station's public
10 service. I'm proud that we increased fundraising.

11 One of the things that I implanted during
12 my time at KALW was an underwriting program, something
13 that we had never had at the station before. In its
14 first year in operation we raised \$50,000 on a part
15 time basis.

16 I'm glad that when I left the station
17 there were those in the industry who recognized that
18 I did such a good job at the station that upon leaving
19 the station an organization for the Corporation for
20 Public Broadcasting here in Washington, D.C. called me
21 before I called them and said come on out. That
22 really validated the work that I did at the station.

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1 That's my own personal take on the
2 station. If I can recognize the work of current
3 management at the station, I left the station with
4 just over 100,000 listeners.

5 I know the current management at the
6 station has worked very hard and that the station's
7 listenership now is around 150,000 listeners. So the
8 station's public service has been strengthened even
9 that much more.

10 I'm proud that the work that I did at the
11 station when I was there has continued under the
12 current management.

13 MR. PRICE: Thank you very much for your
14 testimony, Mr. Ramirez. No further questions, Your
15 Honor.

16 JUDGE SIPPEL: Do you have any cross on
17 the re-direct?

18 MR. SHOOK: I do.

19 RE CROSS EXAMINATION

20 BY MR. SHOOK:

21 Q Mr. Ramirez, one of the things that
22 Counsel said was they discussed the apparent

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1 disagreement with your use of research in determining
2 what programming to change and the effectiveness of
3 any changes that were made.

4 What I was wondering, because I don't
5 think this was discussed, was how did Dave Evans
6 communicate with you that he had a problem with your
7 use of research and determining what programming to
8 change?

9 A Dave Evans never directly communicated
10 that he was having a problem with me using station
11 research, it was Jesse Lopez who regularly
12 communicated his displeasure with the use of station
13 research.

14 Q How did he do that?

15 A How did he do that? He would tell me that
16 he didn't like that we were using station research.
17 He would tell me that there were other ways to measure
18 the audience and we disagreed that the other way to
19 use -- to research the audience didn't allow for
20 comparative, a comparative analysis of how our station
21 was serving the community versus how another station
22 was serving the community using different research.

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1 Q Did he suggest a particular method that
2 you should have used?

3 A I don't remember.

4 Q But he just didn't' like whatever it was
5 that you were doing?

6 A Correct.

7 Q When did he first communicate this to you?

8 A I can't specifically recall.

9 Q Well you were there for a year and a half,
10 and the records seem to reflect that Mr. Lopez was
11 there the entire time that you were, so could you just
12 give me a rough idea when Mr. Lopez started to
13 communicate with you that he was having a problem with
14 what you were doing?

15 A He always had a problem, so it would have
16 been throughout my tenure.

17 Q He communicated with you orally?

18 A Yes.

19 Q He didn't reduce his thoughts to writing?

20 A I don't remember.

21 Q Over the course of the year and a half,
22 approximately how many times would you say that Mr.

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1 Lopez communicated with you his displeasure about your
2 use of research?

3 A I don't remember.

4 Q Did he ever offer specific suggestions as
5 to what you should do instead?

6 A I don't remember.

7 Q Now you also mentioned in response to
8 questions from Counsel from SFUSD that you consulted
9 with Mr. Helgeson about programming changes, do you
10 recall stating that?

11 A Yes.

12 Q In what context would you consult with
13 him? In other words, at what point did you start to
14 consult with Mr. Helgeson about the -- whether or not
15 it was a good idea to make certain programming
16 changes?

17 A It could have been at any number of
18 points. As I was considering making any program
19 change, at some point I may have gone to Bill and
20 asked him Bill, what do you think about this change?

21 Q Was he involved in the research aspects in
22 any way?

1 A No.

2 Q Was he presented with any kind of research
3 data that would suggest that one change might be
4 better than another?

5 A By me?

6 Q By anybody?

7 A I only know what I would present him with
8 and I would present him with what I knew. I wouldn't
9 -- it wouldn't -- I wouldn't have asked him for an
10 analysis. That was my job.

11 Q Well what did you present him with?

12 A I would have presented him top line
13 reports. For example, this is what our audience was
14 last quarter; this is what our audience is this
15 quarter.

16 Q What was he supposed to tell you as a
17 result of that?

18 A I wasn't expecting him to tell me
19 anything. Again, like I said, I wasn't expecting him
20 to perform any kind of analysis, I was reporting to
21 him.

22 Q Maybe I'm a little confused about what you

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1 meant by the word consult. What is it that Mr.
2 Helgeson was supposed to be doing in this process?

3 A Again, I would be seeking his advice such
4 that I would ask him Bill what do you think about this
5 program change? And I would expect some kind of
6 qualitative assessment such as I think if we do more
7 X than Y, then the program will sound better.

8 Q A qualitative assessment as opposed to a
9 quantitative assessment?

10 A Yes.

11 Q Would Mr. Helgeson be involved in
12 assessing the impact of any research on the changes
13 that you proposed to make or had made?

14 A No. No, like I said, I was responsible
15 for conducting the analysis of the research. Maybe if
16 I can use a different, a better example of what I
17 might consult Bill with.

18 Q Feel free.

19 A Say a program I've worked with Marty
20 Nemko. At some point in the past the programists
21 school and career talked with Marty Nemko and may have
22 asked a Bill a question like do you think a title like

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1 Work with Marty Nemko will be more catchy than a title
2 like School and Career talk with Marty Nemko? And
3 Bill might say sure.

4 Q Okay. I just wanted to get an idea of
5 what it was you meant when you used the term consult
6 with respect to Mr. Helgeson. Do you have any other
7 examples in mind?

8 A That's the best example I can come up
9 with?

10 Q Do you have any other examples at all?

11 A Bill was also involved in putting the
12 program schedule together for the program guide. So
13 say if we made a change that -- like Open Air -- for
14 the layout of the program guide, we would have to have
15 a new strip for Open Air. I might ask Bill, Bill, in
16 the program guide do you think it should say Open Air
17 with Michael Johnson and Alan Farley, or Open Air with
18 Alan Farley and Michael Johnson?

19 Q Okay. Now Counsel for SFUSD also asked
20 you some questions about your January 1998 declaration
21 and let me refer you to SFUSD Exhibit 4 and your
22 declaration begins on page 47 of that exhibit. And

1 your Counsel asked you questions about paragraphs 11
2 and 12.

3 A It's not number four in my book.

4 Q It might be in the wrong place. It's
5 going to be in the binder of materials of union code.

6 A Which number?

7 Q That one. Exhibit four.

8 A Okay. That's not in here.

9 Q This isn't -- oh. Beginning at page 47.

10 A Okay. I see that. Sorry.

11 Q Your Counsel for SFUSD had asked you what
12 you were trying to convey with respect to paragraph 11
13 and he also asked you what were you trying to convey
14 with respect to paragraph 12.

15 A Yes.

16 Q My question to you is what were you trying
17 to convey in paragraph nine?

18 A I think what that paragraph conveys is with
19 respect to the affidavit that -- Dave Evans' affidavit
20 that was attached to the Golden Gate Public Radio
21 petition where he tried to bring to my attention the
22 public file as well the paragraph goes on to say that

1 ultimately I did look at the public inspection file
2 which ultimately followed up on what he wanted to
3 bring to my attention in the meeting that he says he
4 has -- he had with me back in, when I first started at
5 the station.

6 Q What were you trying to convey in
7 paragraph ten?

8 A Paragraph ten is with respect to two
9 affidavits. One from Susan Hecht, and one from Mel
10 Baker, both of which were attached to the Golden Gate
11 Public Radio Petition to deny the station's license
12 renewal application.

13 With respect to Susan Hecht, what I was
14 saying there is that I assigned her to work to review
15 the file. She gave me a list, I didn't use it. With
16 respect to Mel Baker, apparently he made some
17 allegation in his affidavit about EEO and I go on to
18 talk about them.

19 Q Okay. Your Counsel, or Counsel for SFUSD,
20 excuse me, also asked you a number of questions about
21 conversations you had or may have had with Mr. Sanchez
22 in connection with the license renewal application and

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1 some of the matters that came up subsequently and I
2 wanted to clarify a couple of things in terms of when
3 conversations took place.

4 Whether conversations took place at all.
5 And if you have any recollection whatsoever, the
6 approximate length of any conversation that you may
7 have had. Now, with that background in mind, I'd like
8 you to turn to EB Exhibit 7, the first page.

9 A Okay.

10 Q First of all, if you go down to the third
11 entry, which is entry 18, 19. I believe your
12 testimony in response to questions from Counsel for
13 SFUSD suggested that there may have been a
14 conversation that took place on that date between
15 yourself and Mr. Sanchez. Do you see any reference to
16 a conversation?

17 A No I don't.

18 Q Do you recall that any such conversation
19 occurred on that date?

20 A No I don't.

21 Q Now, moving to the bottom of the page one
22 of EB Exhibit 7, entry 1946. Your testimony if I

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1 recall it correctly also indicated that there may have
2 been a conversation between yourself and Mr. Sanchez
3 on that date. Do you see any reference there to a
4 conversation between yourself and Mr. Sanchez?

5 A No I don't, but I see there is a reference
6 to a conversation he would have had with the school
7 district's attorney.

8 JUDGE SIPPEL: Excuse me. I just missed
9 part of that, my --

10 THE WITNESS: What I see there is a
11 conversation that Ray Sanchez would have had with the
12 SFUSD attorney.

13 JUDGE SIPPEL: That being?

14 THE WITNESS: Mr. Barmore.

15 JUDGE SIPPEL: Thank you.

16 BY MR. SHOOK:

17 Q But no conversation with you?

18 A Correct.

19 Q Okay. Moving on to the second page of EB
20 seven, the third entry, entry 1964, do you have --
21 does it say anything there about a conversation
22 between yourself and Mr. Sanchez?

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1 A No, it doesn't.

2 Q Do you have any independent recollection
3 that such a conversation or a conversation took place
4 on that date?

5 A No, I don't.

6 Q Moving on to EB Exhibit 7, page three.
7 The entry 2124. Is there anything there, in that
8 entry that indicates that you had a conversation with
9 Mr. Sanchez on that date?

10 A No, there isn't.

11 Q Do you have any independent recollection
12 that you had a conversation with Mr. Sanchez on that
13 date?

14 A No.

15 Q Moving to page four of EB Exhibit 7. This
16 would be for entry 2254, which is about two-thirds to
17 three-quarters of the way down the page. There are
18 three matters noted there, are there not?

19 A Can you repeat the number again?

20 Q Two-two-five-four.

21 A Okay, I see that. I'm sorry, could you
22 repeat the question?

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1 Q Yes. Do you see that there are three
2 matters noted there?

3 A Yes.

4 Q That one of those matters is a call to
5 you?

6 A Yes.

7 Q Now in terms of the amount of time that
8 Mr. Sanchez billed for that day's activities with
9 respect to SFUSD, do you have any recollection as to
10 how much of that hour concerned the telephone call
11 that he had with you?

12 A No I don't.

13 Q Moving on to entry 2264 on November 20,
14 there are a number of references there. Looks like
15 one of them is a conference with you?

16 A Yes.

17 Q Mr. Sanchez billed for one hour and
18 apparently another quarter of an hour for his time.
19 You see that?

20 A Yes.

21 Q Do you have any recollection as to how
22 much of that time was devoted to the telephone call

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1 with you?

2 A No.

3 Q Mr. Ramirez, in response to some questions
4 from counsel for SFUSD, you had indicated that in
5 connection with the renewal application process
6 initially what you received from the FCC was a
7 postcard of some kind?

8 A Yes, I remember receiving a post card.

9 Q Then subsequently you received something
10 else. What was the second material or document or set
11 of materials that you received from the FCC?

12 A What I would have been referring to was
13 the license renewal application.

14 Q Was that -- how was that addressed? Do
15 you recall whether it was addressed to you directly or
16 it was addressed to the station? How did it come to
17 you?

18 A I don't remember how I received it.

19 Q When it came to you what did you actually
20 get? Did you get an envelope that had some materials
21 in it or?

22 A I don't remember what it came in.

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1 Q Do you recall whether you received only an
2 application or whether there were some instructions to
3 help you understand how to answer the questions?

4 A I don't remember.

5 Q In some of the questions that came up, the
6 indication was that you had only an application to
7 look at. Do you ever recall receiving instructions or
8 having instructions to look at in order to fill out
9 the application form?

10 A I don't remember if I had instructions to
11 refer to.

12 Q In all of the conversations that you had
13 with Mr. Sanchez about the renewal application and the
14 questions that you may have had did any discussion
15 come up with you and Mr. Sanchez about looking at
16 instructions and determining from that how to answer
17 the question?

18 A I don't remember.

19 MR. PRICE: Your Honor, we have nothing
20 further.

21 JUDGE SIPPEL: I've got a few questions.

22 THE WITNESS: Yes, sir.

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1 JUDGE SIPPEL: First of all, you were
2 instructed on the sequestration. Did you discuss your
3 testimony with anyone other than Counsel last night
4 after you left the stand here?

5 THE WITNESS: No, sir.

6 JUDGE SIPPEL: Okay. Now -- and, you did
7 testify that Mr. Evans talked to you when you first
8 came aboard in August of '96 about the public
9 information file, expressing his pleasure with it, if
10 I can characterize it that way?

11 THE WITNESS: Yes.

12 JUDGE SIPPEL: All right. And you looked
13 at it?

14 THE WITNESS: No, I didn't.

15 JUDGE SIPPEL: I thought there was
16 something here that said that you did.

17 THE WITNESS: I first looked at the public
18 inspection file, knowing what the public inspection
19 file, the significance of it is when I was completing
20 the license renewal application.

21 JUDGE SIPPEL: Right, but when he told you
22 about it back in August of 1996, you did not look at

1 it?

2 THE WITNESS: Correct.

3 JUDGE SIPPEL: At that time?

4 THE WITNESS: Correct.

5 JUDGE SIPPEL: Did you have -- what
6 significance did you ascribe to a public information
7 file at that time?

8 THE WITNESS: At the time I didn't
9 understand the significance or purpose of the public
10 inspection file.

11 JUDGE SIPPEL: Well the reason I'm just
12 hesitating because you were hired on as a General
13 Manager and isn't a public information file one of the
14 fundamental basics to managing a station?

15 THE WITNESS: Yes. I completely and
16 clearly understand that today. At the time I was
17 hired at KALW I didn't have familiarity with FCC rules
18 and regulations because my previous position at KPBS
19 radio and TV in San Diego didn't compel that kind of
20 familiarity with FCC rules and regulations.

21 At the time I did have familiarity with
22 the principles behind the FCC's relationship with

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1 stations.

2 JUDGE SIPPEL: Now, Mr. Evans came to you
3 -- what was his position at KALW?

4 THE WITNESS: Dave was the station's Chief
5 Engineer.

6 JUDGE SIPPEL: Had you ever had any
7 experience in preparing or assisting in doing the
8 preparation of a renewal application before?

9 THE WITNESS: No, sir.

10 JUDGE SIPPEL: Before this application --
11 okay. Going back to that reference in Mr. Sanchez's
12 billing notes, December 2, 1997 to inventory, you've
13 been asked that a number of times here. Did Mr.
14 Sanchez have a copy of Susan Hecht's document outline?

15 THE WITNESS: I don't know.

16 JUDGE SIPPEL: You don't know whether he
17 ever received a copy of that?

18 THE WITNESS: Yes. I'm aware of that.

19 JUDGE SIPPEL: You mentioned Mr. Jason
20 Lopez was the one that expressed his disagreement with
21 you on this -- what you explained before about how you
22 measure the productivity of a non-commercial station?

1 THE WITNESS: Yes.

2 JUDGE SIPPEL: What was his position at
3 the station?

4 THE WITNESS: Jason Lopez was an As-Needed
5 Announcer/Operator.

6 JUDGE SIPPEL: What were his credentials
7 as an Announcer/Operator?

8 THE WITNESS: Yes, at the station.

9 JUDGE SIPPEL: Did he have any other --
10 how long had he been in the industry in those
11 capacities?

12 THE WITNESS: I know he'd been at the
13 station since I started there.

14 JUDGE SIPPEL: Okay. Had he been there a
15 number of years, do you know, or --

16 THE WITNESS: I don't remember how long
17 he'd been at the station.

18 JUDGE SIPPEL: Okay. I guess that's all
19 I have with you. Is there anything you want to clear
20 up on this? I'm not really inviting more re-direct
21 but before Mr. Ramirez goes back to Alaska maybe we
22 should be sure we've got it all done.

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1 MR. PRICE: He didn't, just to clarify the
2 Susan Hecht memo; you didn't send the Susan Hecht memo
3 to anyone at all, did you?

4 THE WITNESS: I don't remember.

5 MR. PRICE: I don't have any other
6 questions for him.

7 JUDGE SIPPEL: You all set, Mr. Shook,
8 with your side? On this witness?

9 MR. SHOOK: I think that's everything
10 relevant.

11 JUDGE SIPPEL: All right. Well, I guess
12 that completes your testimony then, Mr. Ramirez.
13 Thank you very much. You certainly are -- you still
14 continue to be bound by your sequestration order,
15 because I don't want other witnesses, before they
16 testify, hearing from you about your experience up
17 here with respect to your testimony.

18 THE WITNESS: Yes, sir.

19 JUDGE SIPPEL: After this hearing is
20 concluded, the sequestration order is -- you're
21 released from it. But consult with Counsel before you
22 contact with anybody else that would be my best advice

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